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August 14, 2019

VIA ECF

Hon. Lois Bloom, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: First Letter Motion Requesting Extension of Time to Complete Discovery

1:18-cv-06616 *Xing et al v. Mayflower International Hotel Group Inc. et al*

Dear Honorable Judge Bloom,

We represent the Plaintiffs' in the above referenced matter. We write respectfully along with the consent of Defendants' to respectfully request to extension of time to complete discovery from August 28, 2019 to November 21, 2019. This is parties first request for extension of time to complete discovery and granting such request will not prejudice any party. Currently, there is a pending ruling on Plaintiffs Motion for Conditional Collective Certification.

On January 28, 2019, Your Honor ordered parties to complete discovery by August 28, 2019. Both the parties have exchanged discovery requests and responses and are currently trying to schedule the depositions. The undersigned office is not available for scheduling depositions in the month of August or until the last week of September 2019, due to prior Court appearances, Trial and depositions scheduled in other matters. Additionally, before Your Honor is pending ruling on Plaintiffs Motion for Conditional Collective Certification. In light of the pending ruling of the motion for conditional collective certification and Plaintiffs' unavailability to schedule the deposition before the scheduled deadline, Parties respectfully request this Court to grant extension of time to complete discovery from August 28, 2019 to November 21, 2019. This is parties first request for extension of time to complete discovery.

For all the foregoing reasons, Plaintiffs respectfully request this Court to grant parties request for extension of time to complete discovery from August 28, 2019 to November 21, 2019.

We thank the Court for its time and consideration in this matter and apologize for any inconvenience caused to this Court.

Respectfully Submitted

/s/ John Troy

John Troy

Attorney for Plaintiffs

Cc: all counsel of record *VIA ECF*

JT/pk